

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>RICHARD HANSON,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>CASE NO. 3:18-cv-00524</b>
	)	<b>JUDGE TRAUGER</b>
<b>v.</b>	)	<b>JURY DEMAND</b>
	)	
<b>JOHN McBRIDE and</b>	)	
<b>JAM PRODUCTIONS, INC. d/b/a</b>	)	
<b>BLACKBIRD STUDIOS</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants John McBride and Jam Productions, Inc. d/b/a Blackbird Studios, by and through counsel and pursuant to Fed. R. Civ. P. 56, respectfully request that this Court grant them judgment as a matter of law on Plaintiff's claims in this matter and dismiss the Complaint. As grounds for this Motion, Defendants state that there is no genuine issue of material fact and they are entitled to judgment as a matter of law on the claims brought by Plaintiff. A Memorandum of Law and Statement of Undisputed Material Facts in support of this Motion are filed contemporaneously with this Motion.

WHEREFORE, Defendants respectfully request that this Court grant this Motion for Summary Judgment and dismiss the Complaint in this matter.

Respectfully submitted:

**NEAL & HARWELL, PLC**

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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 6<sup>th</sup> day of September, 2019, the foregoing was electronically filed with the Court and a copy was served via the method(s) indicated below, on the following:

- Hand
- Mail
- Fax
- Fed. Ex.
- E-Mail
- EFS

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